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Attorneys for Plaintiff
LAURA SANTOYO

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LAURA SANTOYO,

Plaintiff,

v.

RICH PRODUCTS
CORPORATION, a California
Corporation, and DOES 1-10,
inclusive,

Defendants.

Case No. 2:24-cv-1856-JDP

**JOINT STIPULATION FOR
EXTENDING DEADLINES AND
~~PROPOSED~~ ORDER**

Complaint Filed: May 24, 2024

LAURA SANTOYO (“Plaintiff”) and RICH PRODUCTS CORPORATION
 (“Defendant”) (collectively, “the Parties”), by and through their undersigned
 counsel, hereby stipulate and agree as follows:

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1 WHEREAS, the Parties previously filed a Joint Stipulation to continue certain
2 dates in the Court's Pretrial Scheduling Order (DKT 20), which the Court granted
3 on May 29, 2025 (DKT 29), continuing the following deadlines as follows:

- 4 • Initial expert disclosure deadline: July 7, 2025;
- 5 • Rebuttal expert disclosure deadline: July 28, 2025;
- 6 • Deadline for hearing motions to compel discovery: August 18, 2025;
- 7 • Deadline for the Parties to complete discovery: September 8, 2025; and
- 8 • Deadline for hearing dispositive motions: November 10, 2025.

9 WHEREAS, the Parties are continuing ongoing discussions regarding
10 resolution, both directly and through a private mediator, Will C. Klatte, Esq., and
11 agree that efforts to informally resolve the above-captioned Action will be better
12 served if the above-mentioned deadlines are vacated and continued by 90 days by,
13 among other things, allowing the Parties to avoid expenditure of resources on
14 continued fact discovery expert disclosure and discovery, and dispositive motion
15 practice;

16 WHEREAS, the Parties agree and stipulate that continuing the above-
17 mentioned deadlines by 90 days (with the deadline falling on the next Court Day if
18 the 90th day falls on a Saturday or Sunday), as requested by this stipulation, would
19 cause fair, efficient and just administration of the Action;

20 WHEREAS, the Parties agree to stipulate to continuing the above-mentioned
21 deadlines by 60 days (with the deadline falling on the next Court Day if the 60th day
22 falls on a Saturday or Sunday) if a shorter continuance is preferred by the Court;

23 WHEREAS the Parties have only requested one prior continuance and believe
24 this second continuance is necessary for the Parties to fully explore settlement
25 without the need to expend resources to comply with the currently set deadlines;

26 WHEREAS, the Parties agree and stipulate that no Parties will be prejudiced
27 by the requested relief;

28 ///

IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES
HERETO, THROUGH THEIR RESPECTIVE COUNSEL, THAT THE INITIAL
EXPERT DISCLOSURE DEADLINE; REBUTTAL EXPERT DISCLOSURE
DEADLINE; DEADLINE FOR HEARING MOTIONS TO COMPEL
DISCOVERY; DEADLINE FOR THE PARTIES TO COMPLETE DISCOVERY;
AND DEADLINE FOR HEARING DISPOSITIVE MOTIONS SHALL BE
CONTINUED BY NINETY DAYS.

IT IS SO STIPULATED.

Dated: July 8, 2024

GAVRILOV & BROOKS

By: /s/ Alexandra Darling

J. Edward Brooks
Alexandra Darling
Attorneys for Plaintiff
LAURA SANTOYO

Dated: July 8, 2024

HIRSCHFELD KRAEMER LLP

By: /s/ Michelle C. Freeman

Monte Grix
Michelle C. Freeman
Attorneys for Defendant
RICH PRODUCTS CORPORATION

ATTESTATION

In accordance with Local Rule 131(e), the attorney whose signature appears
below, and who is e-filing this document, affirms he has obtained authorization and
approval from all other counsel listed above to file this document on that counsel's
behalf.

/s/ Michelle C. Freeman

Michelle C. Freeman

[PROPOSED] ORDER

Based upon the foregoing stipulation of the Parties, and good cause appearing therefor, **IT IS HEREBY ORDERED AS FOLLOWS:**

The Parties' initial expert disclosure deadline of July 7, 2025 is hereby vacated, with a new deadline of **October 6, 2025**.

The Parties' rebuttal disclosure deadline of July 28, 2025 is hereby vacated, with a new deadline of **October 27, 2025**.

The deadline of August 21, 2025 for the Parties to have motions to compel discovery heard is hereby vacated, with a new deadline of **November 20, 2025**.

The deadline of September 8, 2025 for the Parties to complete discovery is hereby vacated, with a new deadline of **December 8, 2025**.

The deadline of November 13, 2025 for the Parties to have dispositive motions heard is hereby vacated, with a new deadline of **February 12, 2026**.

Aside from these new deadlines, the Court's Initial Pretrial Scheduling Order (DKT 20) remains unaffected.

IT IS SO ORDERED.

Dated: June 24, 2025



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE